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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 JOHN and JOANN DOE, parents and natural
14 guardians of JANE DOE, a minor,

15 Plaintiffs,

16 v.

17 CLARK COUNTY SCHOOL DISTRICT;
18 CLARK COUNTY EDUCATION
19 ASSOCIATION; DARRYL L. LANCASTER;
20 KEMALA WASHINGTON,

21 Defendants.

CASE NO 2:24-cv-00284-GMN-BNW

**STIPULATION TO EXTEND
BRIEFING SCHEDULE WITH
RESPECT TO DEFENDANT
CLARK COUNTY EDUCATION
ASSOCIATION'S MOTION TO
DISMISS THE FIRST AMENDED
COMPLAINT [ECF No. 56]**

(First Request)

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23 Pursuant to Rule IA 6-1 of the Local Rules of Practice for the United States District
24 Court, District of Nevada, Plaintiffs, John and Joann Doe, parents and guardians of Jane Doe
25 (“**Plaintiffs**”) and Defendants Clark County School District (“**CCSD**”); Clark County
26 Education Association (“**CCEA**”); Darryl L. Lancaster (“**Mr. Lancaster**”) and Kemala
27 Washington (“**Ms. Washington**”), by and through their attorneys of record, stipulate and agree
28 to extend the briefing schedule with respect to CCEA’s Motion to Dismiss the First Amended

1 Complaint [ECF No. 56] (“**MTD**”), which was filed on April 8, 2025, as follows:

2 1. CCEA filed its MTD on Tuesday, April 8, 2025.

3 2. CCEA’s MTD seeks dismissal of each of Plaintiffs’ claims asserted against
4 CCEA--i.e., (1) Title IX; (2) Civil Rights under Sec. 1983; (3) Violations of NRS Sec.
5 41.139655; (4) Intentional Infliction of Emotional Distress; (5) Negligence; (6) Negligent
6 Infliction of Emotional Distress; and (7) Negligent Hiring, Training, and Supervision. *See* MTD
7 [ECF No. 56] at i:7-26.

8 3. The current deadline to respond to the MTD is April 22, 2025.

9 4. When the MTD was filed, Plaintiffs’ counsel have mediation in another case on
10 April 15, 2025, and multiple depositions in this and other cases on April 17-18 and 22, 2025.
11 Additionally, the undersigned has been sick and out of the office since April 14, 2025. All of
12 this together has effectively precluded Plaintiffs’ counsel from commencing the preparation of
13 Plaintiffs’ intended response to the MTD for most of the two-week response period.

14 5. On April 14, 2025, Plaintiff’s counsel requested and received an accommodation
15 from CCEA’s counsel, John Delikanakis, in light of these circumstances.

16 6. Given the nature and complexity of the issues raised in the MTD, coupled with
17 Plaintiffs’ counsel’s prior commitments in other cases that have precluded Plaintiffs from being
18 able to commence preparation of the intended Response, the parties agree that it is in the best
19 interests of all to extend the briefing schedule with respect to the MTD.

20 7. The parties have agreed to provide Plaintiffs with a two-week extension until
21 May 6, 2025, to provide their Response.

22 8. The parties have also agreed to allow CCEA to file its Reply brief on before May
23 27, 2025.

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9. This is the parties' first request for an extension of the briefing with respect to the MTD. The parties also affirm that this extension is not made with an improper purpose but is made in good faith in light of the present circumstances and the issues presented in the MTD.

DATED THIS 15th of April, 2025.

Cloward Trial Lawyers

/s/ Angela M. Lee

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Attorneys for Plaintiffs

DATED this 16th of April, 2025

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/s/ John Delikanakis

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Attorneys for Defendant, CCEA

DATED THIS 16th of April, 2025

Law Offices of Andrew M. Leavitt

/s/ Andrew M. Leavitt

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Attorney for Defendant, Mr. Lancaster

---and---

Tyson & Mendes LLP

Co-counsel for Defendant, CCEA

DATED THIS 16th of April, 2025

Olson Cannon Gormley

/s/ Thomas D. Dillard, Jr.

THOMAS D. DILLARD, JR. ESQ.

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Attorneys for Defendants CCSD, Washington

ORDER

IT IS SO ORDERED.


Gloria M. Navarro

UNITED STATES DISTRICT JUDGE

Dated: April 16, 2025.